

EXHIBIT 103

From: Miles Ehrlich <miles@ramsey-ehrllich.com>
Sent: Friday, April 14, 2017 8:38 AM
To: Patrick Schmidt
Cc: Jordan Jaffe; Amy Craig; Ismail Ramsey; QE-Waymo
Subject: Re: Waymo Litigation - Search Terms for Mr. Levandowski's Search

Patrick -

I meant to say that we do not have any responsive, non-privileged documents to provide this morning.

We will, of course, be complying in all respects with Judge Alsup's order.

Thank you,

- Miles

Sent from my mobile phone

On Apr 14, 2017, at 8:14 AM, Patrick Schmidt <patrickschmidt@quinnemanuel.com> wrote:

Miles,

We didn't receive a response to my message below. Can you please provide the requested clarification?

Patrick Schmidt
Associate
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Los Angeles, CA 90017
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From: Patrick Schmidt
Sent: Thursday, April 13, 2017 7:27 PM
To: 'Miles Ehrlich' <miles@ramsey-ehrllich.com>; Jordan Jaffe <jordanjaffe@quinnemanuel.com>; Amy Craig <amy@ramsey-ehrllich.com>
Cc: Ismail Ramsey <izzy@ramsey-ehrllich.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Subject: RE: Waymo Litigation - Search Terms for Mr. Levandowski's Search

Miles,

Can you clarify what you mean when you say that you “are not going to be in a position to produce any documents responsive to the three requests for production authorized by Judge Alsup.” Does this mean that you don’t plan on producing documents at all? Or, are you reserving the possibility that you may produce documents at some later date? We note that Judge Alsup specifically ordered these documents produced in advance of tomorrow’s deposition, and you have not sought relief from that order.

We reserve all rights to seek appropriate relief with respect to any responsive, non-privileged documents that are not produced tomorrow in accordance with the Judge’s order.

Patrick Schmidt

Associate

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From: Miles Ehrlich [<mailto:miles@ramsey-ehrllich.com>]

Sent: Thursday, April 13, 2017 7:11 PM

To: Patrick Schmidt <patrickschmidt@quinnemanuel.com>; Jordan Jaffe <jordanjaffe@quinnemanuel.com>; Amy Craig <amy@ramsey-ehrllich.com>

Cc: Ismail Ramsey <izzy@ramsey-ehrllich.com>; QE-Waymo <gewaymo@quinnemanuel.com>

Subject: RE: Waymo Litigation - Search Terms for Mr. Levandowski's Search

Hi Patrick –

We are moving as quickly as possible to comply with the Judge’s order of yesterday in all respects.

But as a courtesy, I did want to let your team know right away that we are not going to be in a position to produce any documents responsive to the three requests for production authorized by Judge Alsup. I hope that helps for your planning purposes.

Best regards,

Miles

Miles Ehrlich | Ramsey & Ehrlich LLP | 803 Hearst Avenue | Berkeley, CA 94710 | Tel: (510) 548-3600 | Fax: (510) 291-3060 | miles@ramsey-ehrllich.com | www.ramsey-ehrllich.com

From: Patrick Schmidt [<mailto:patrickschmidt@quinnemanuel.com>]

Sent: Thursday, April 13, 2017 6:48 PM

To: Jordan Jaffe <jordanjaffe@quinnemanuel.com>; Amy Craig <amy@ramsey-ehrllich.com>

Cc: Miles Ehrlich <miles@ramsey-ehrllich.com>; Ismail Ramsey <izzy@ramsey-ehrllich.com>; QE-Waymo <gewaymo@quinnemanuel.com>

Subject: RE: Waymo Litigation - Search Terms for Mr. Levandowski's Search

Counsel,

Further to Jordan's email below, and for planning purposes, can you please tell us whether you intend to produce any documents tomorrow in response to the subpoena to Mr. Levandowski? If you do intend to produce documents, can you tell us the approximate volume? Per Judge Alsup's comments at the 4/12 hearing, we are to work out a plan to review documents at the deposition. We wanted to get that conversation started if needed.

Patrick Schmidt

Associate

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From: Jordan Jaffe

Sent: Thursday, April 13, 2017 6:10 PM

To: Amy Craig <amy@ramsey-ehrllich.com>

Cc: Miles Ehrlich <miles@ramsey-ehrllich.com>; Ismail Ramsey <izzy@ramsey-ehrllich.com>; QE-Waymo <gewaymo@quinnemanuel.com>

Subject: RE: Waymo Litigation - Search Terms for Mr. Levandowski's Search

Amy,

Attached is a list of files and two lists of search terms for your possible use in responding to Waymo's subpoena. Each one of these documents is designated as Waymo HIGHLY CONFIDENTIAL –ATTORNEYS' EYES ONLY. For avoidance of doubt, this means that you cannot share the information contained in these files with Mr. Levandowski.

We look forward to receiving the requested documents at the start of Mr. Levandowski's deposition tomorrow morning.

Best regards,

Jordan R. Jaffe // Quinn Emanuel // 415.498.0556 // jordanjaffe@quinnemanuel.com

From: Amy Craig [<mailto:amy@ramsey-ehrllich.com>]

Sent: Thursday, April 13, 2017 3:53 PM

To: Jordan Jaffe <jordanjaffe@quinnemanuel.com>